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September 1, 2023

VIA ECF

The Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Unopposed Letter Motion for Permission to Travel –
United States v. Javier Aguilar, No. 20 Cr. 390 (ENV) (E.D.N.Y.)

Dear Judge Vitaliano,

We write to request that the Court permit Defendant Javier Aguilar to travel to Nevada from September 27 through October 2, 2023, for a vacation. The Court has previously granted Mr. Aguilar permission to travel to Nevada without incident or opposition from the government. *See* Min. Order (Feb. 14, 2023) (granting unopposed request at ECF No. 124).

We have discussed this travel request with counsel for the government, as well as with the U.S. Pretrial Services Offices for the Eastern District of New York and the Southern District of Texas. The government has no objection to this request, provided that Mr. Aguilar remains subject to location monitoring during the trip. Mr. Aguilar, of course, continues to be subject to location monitoring pending the Court's resolution of his motion to remove that condition of his pretrial release. *See* ECF Nos. 163, 167–68. The Eastern District of New York Pretrial Services Office also raised no objection to the request, so long as Mr. Aguilar provides his travel itinerary and information to his Pretrial Services Officer. Finally, the Southern District of Texas Pretrial Services Office confirmed that it takes no position on the request.

Accordingly, Mr. Aguilar respectfully requests that the Court modify the terms of his pretrial release to permit him to travel to Nevada from September 27 to October 2, 2023. We will file a similar motion simultaneously with the U.S. District Court for the Southern District of Texas.

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We appreciate the Court's consideration of this request.

Respectfully submitted,



Alex Spiro

Counsel for Defendant Javier Aguilar

cc: U.S. Pretrial Services Officer Bianca C. Carter, E.D.N.Y. (via email)
U.S. Probation Officer Ryan D. McClellan, S.D. Tex. (via email)
Counsel of Record (via ECF)